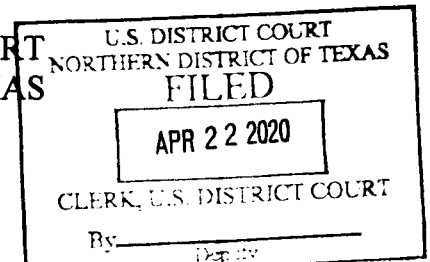


ORIGINAL

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION



UNITED STATES OF AMERICA

v.

WILLIAM ADAM JONATHAN SMITH  
a/k/a "Detroit" (01)

No. 4:20-MJ- 285

CRIMINAL COMPLAINT

I, Special Agent John Kochan, hereafter identified as your Affiant the undersigned Complainant, being duly sworn, set forth facts and reasonable inferences from those facts, establishing that there is probable cause to believe that:

From on or about August 1, 2019 through on or about October 12, 2019, exact dates unknown, in the Northern District of Texas, Fort Worth Division, and elsewhere, **William Adam Jonathan Smith**, also known as "Detroit", committed the offense of Conspiracy to Engage In Child Sex Trafficking, 18 U.S.C. § 1594(c)(18 U.S.C. §§ 1591(a) and (b)(2)) as related to Jane Doe 1.

BACKGROUND

I am a Special Agent with the Department of Homeland Security (DHS) - Homeland Security Investigations (HSI) assigned to the Office of the Special Agent-in-Charge, Dallas, Texas. This complaint is based on the following facts gathered through my investigation conducted in coordination with the Texas Attorney General's Office Austin Division. Our investigation included the interviews of several victims and witnesses, investigative techniques such as administrative subpoenas and judicial search warrants, as well as reports or other information relayed to me by other law enforcement

agencies including, but not limited to: the Fort Worth Police Department, Texas Attorney General's Office and the Texas Department of Public Safety (DPS).

### **INTRODUCTION**

1. I am currently assigned to the Human Trafficking and Human Smuggling Investigations Group, which is a member of the North Texas Trafficking Task Force (NTTTF). I have been a Special Agent with DHS since 2009, and I am a "federal law enforcement officer" within the meaning of Federal Rule of Criminal Procedure 41(a)(2)(C), that is, a government agent engaged in enforcing the criminal laws and duly authorized by the Attorney General to request a search warrant. I have been a federal law enforcement agent since 1998, and I am currently assigned to the Homeland Security Investigations (HSI) - North Texas Trafficking Task Force (NTTTF). I have completed the Criminal Investigator Training Program (CITP) and ICE Special Agent Training (ICESAT) program at the Federal Law Enforcement Training Center (FLETC) in Glyncro, Georgia. I have also been trained and am responsible for conducting criminal investigations of alleged violations of federal law, with a focus on human trafficking.

2. As a criminal investigator for HSI, I have gained extensive training in the area of immigration law and human trafficking/human smuggling operations. I have been involved in the interviewing and debriefing of numerous defendants, informants, and witnesses and other persons who have personal knowledge of human trafficking and/or who have personal knowledge of the amassing, spending, converting, transporting, distributing, laundering, and/or concealing of the proceeds of human trafficking. I have

testified in judicial proceedings and prosecutions for violations of laws concerning the trafficking of persons. I have also investigated or participated in investigations including but not limited to, human trafficking/smuggling, narcotics trafficking, transnational criminal organizations (street gangs), homicide/death investigations, and money laundering. I routinely work with other law enforcement agencies on a cooperative basis. Through these contacts, I have gained experience and knowledge in the investigation and prosecution of human traffickers and dismantling human trafficking organizations.

3. I have personally participated in this human trafficking investigation since October 12, 2019, and I have obtained the facts set forth in this complaint through my participation in the investigation described below by conducting interviews of victims and witnesses, from oral and written reports of other law enforcement officers, and from records, documents and other evidence obtained during this investigation. I have also relied on additional information provided by other law enforcement organizations, including but not limited to: the Fort Worth Police Department, the Texas Attorney General's Office and the Texas Department of Public Safety (DPS). Since this complaint is being submitted for the limited purpose of securing a criminal complaint, I have not included each and every fact known to me concerning this investigation.

#### **PROBABLE CAUSE**

4. On October 12, 2019, Agents from the Homeland Security Investigations (HSI) North Texas Taskforce and Investigators with the Texas Attorney General's Office (Austin, TX) conducted an Anti-Human Trafficking/Prostitution sting operation at the

Fairfield Inn and Suites Hotel located at 6851 West Freeway, Fort Worth, TX 76116.

During the sting operation, Agents encountered a 17 year old (juvenile) female, hereafter identified as Jane Doe 1/JD1. Prior to her encounter, Agents arranged a date for commercial sex acts (prostitution) by contacting JD1 through the "Escort Alligator.com" website, which through my training and experience I know to be a website that is frequently used to arrange commercial sex dates.

5. Upon arriving at the Fairfield Inn and Suites, JD1 was recovered by law enforcement. At the time of her recovery, JD1 was accompanied by an adult female identified as Charity CANTU. I have since identified CANTU as the "Bottom Girl" who assisted **William SMITH** in conducting a commercial sex organization that operated in the areas of Denton, Dallas and Fort Worth, TX.

6. At the time of her recovery, JD1 was interviewed by Sgt. Hruskocy of the Texas Attorney General's Office. During the interview, JD1 identified CANTU as the person who introduced her to what JD1 referred to as "the lifestyle", meaning prostitution. JD1 stated that CANTU received half of the money that JD1 earned by engaging in commercial sex acts, and that CANTU transported her to the Fairfield Inn and Suites hotel knowing that JD1 would be engaging in commercial sex acts with what CANTU believed to be a commercial sex customer (aka "John"). JD1 further stated that CANTU assisted her with posting ads seeking commercial sex customers online.

7. Upon concluding the interview of JD1, Sgt. Hruskocy interviewed Charity CANTU, who was detained at the scene. CANTU was advised of her Miranda Warning and agreed to speak with Sgt. Hruskocy without the presence of legal counsel. During the interview, CANTU corroborated the details provided by JD1. CANTU stated that she and JD1 had engaged in commercial sex acts for approximately 3 months and that she assisted JD1 with posting the ads for commercial sex online via the use of CANTU's cellphone. CANTU further stated that she received all of the money that JD1 made by engaging in commercial sex acts and that all of that money was deposited into CANTU's bank account. CANTU stated that she and JD1 made approximately \$5000-\$6000 per month by engaging in commercial sex acts. CANTU was placed under arrest for state charges of Compelling Prostitution and transported to the Tarrant County Jail for processing.

8. At the time of their encounter at the Fairfield Inn and Suites Hotel, JD1 and CANTU were both found to be in possession of Apple iPhones that were seized as evidence. On October 14, 2019, Sgt. Hruskocy appeared before Senior District Court Judge Everett for the purpose of obtaining search warrants authorizing the search of both Apple iPhones that were seized at the time JD1 and CANTU were encountered. In reviewing the data that was extracted from the Apple iPhone, Sgt. Hruskocy observed a group text message string between CANTU, JD1 and an unknown subject (later identified as **William SMITH**).

9. On October 24, 2019, Sgt. Hruskocy appeared before the Honorable J. Cureton, US Magistrate Judge, at the US District Court Northern District of Texas (Fort Worth Division) for the purpose of signing a Criminal Complaint charging Charity CANTU with violations of 18 USC 1591 (Child Sex Trafficking). CANTU was later arrested and remanded to the custody of the US Marshal Service pending trial/further judicial proceedings.

10. On December 4, 2019, Sgt. Hruskocy and HSI Special Agent M. Pederson attended a Proffer/Interview of Charity CANTU at the US District Court in Fort Worth, TX. CANTU was accompanied by her attorney of record to provide legal advice during the Proffer. During the proffer, CANTU identified **William SMITH** as her pimp/boyfriend and stated she has been engaging in commercial sex acts at the direction of **SMITH** for more than one year. CANTU stated **SMITH** received all of the money that CANTU and JD1 made by engaging in commercial sex acts, frequently through the use of the PayPal and CashApp applications. CANTU stated that **SMITH** wanted to use PayPal and CashApp because the applications were linked to **SMITH's** bank account. CANTU stated **SMITH** used the email accounts mr.incredibol@gmail.com and mr.incredibo@icloud.com as the registered email accounts for Paypal and CashApp. CANTU stated **SMITH** knew JD1's correct age because **SMITH** told CANTU that JD1 was 17 years old. During a subsequent interview that was conducted by Sgt. Hruskocy and S/A Pederson on February 14, 2020, CANTU stated she had been instructed by **SMITH** to groom JD1 and instruct her on how to engage in commercial sex acts.

CANTU stated she did as **SMITH** instructed and accompanied JD1 to several commercial sex dates.

11. On January 20, 2020, Sgt. Hruskocy received information from Google Inc in reference to a federal grand jury subpoena requesting the subscriber information for the email address mr.incredibol@gmail.com. This email address is important because CANTU advised during her proffer that this email address is linked to the Paypal account that is operated by **SMITH** for the purpose of collecting commercial sex proceeds earned by JD1. The records returned by Google Inc conclusively linked **SMITH** to the mr.incredibol@gmail.com email account.

12. On January 30, 2020, Sgt. Hruskocy received information from Paypal Inc in reference to a federal grand jury subpoena requesting records related to the “mrincredibo” Paypal account that CANTU identified as belonging to **William SMITH** and being used to receive the proceeds of JD1’s commercial sex acts. Records returned by Paypal confirm that the Paypal account “mrincredibo” is controlled by **William SMITH**, to include having a recovery email address of mr.incredibol@gmail.com which has been previously identified as belonging to **William SMITH**.

13. In reviewing the financial records linked to **SMITH**’s Paypal account, Sgt. Hruskocy identified two (2) of the commercial sex customers that engaged in commercial sex acts with CANTU. Sgt. Hruskocy identified and interviewed one of the commercial sex customers, hereafter identified as Witness PK. During the interview, PK stated that he

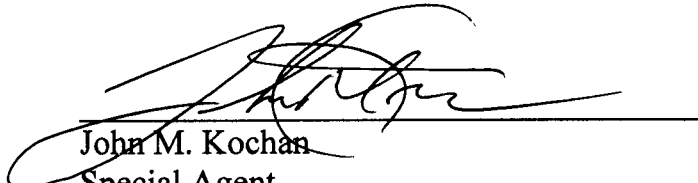
met with CANTU for the purpose of engaging in commercial sex acts on two or three occasions at the Motel 6 located near University Drive in Denton, TX. PK stated that he paid \$150 or \$180 for commercial sex acts via Paypal.

14. I have obtained numerous receipts from the Motel 6 located at 4125 I-35 Frontage Rd, Denton, TX that confirm rooms rented by **William SMITH** corroborating Witness PK's description of events involving commercial sex acts with CANTU. Furthermore, through my training and experience I know that the Motel 6 located at 4125 I-35 Frontage Rd is a location that is frequently utilized by pimps as a location where the pimp will rent a hotel room that is used for the purpose of having their victims engage in commercial sex acts with commercial sex clients. In reviewing the records, I observed that the hotel rooms rented under the name of **William SMITH** also contained the home address linked to **William SMITH**. I further observed the Motel 6 records indicate that **SMITH** has maintained a residence/room at the Motel 6 during the timeframe of June 22, 2018 through October 14, 2019, two days after JD1 was recovered and CANTU was initially arrested.



**CONCLUSION**

15. Based on the foregoing facts and circumstances, I respectfully submit that there is probable cause to believe that beginning on or about August 1, 2019 to on or about October 12, 2019, exact dates being unknown, within the Fort Worth Division of the Northern District of Texas and elsewhere – **William Adam Jonathan Smith**, also known as “Detroit”, committed the offense of Conspiracy to Engage In Child Sex Trafficking, 18 U.S.C. § 1594(c)(18 U.S.C. §§ 1591(a) and (b)(2)) as related to Jane Doe

  
\_\_\_\_\_  
John M. Kochan  
Special Agent  
Department of Homeland Security  
Homeland Security Investigations

Subscribed and sworn before me this 22<sup>nd</sup> day of April 2020, at 10:46  
a.m., in Fort Worth, Texas.

  
\_\_\_\_\_  
JEFFREY L. CURETON  
UNITED STATES MAGISTRATE JUDGE